

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

ARIANA ESPOSITO,

Plaintiff,

v.

MARYLAND DEPARTMENT OF  
STATE POLICE, et al.

Defendants.

Civil Action No.

**JKB 16 CV 2586**

\* \* \* \* \*

**NOTICE OF REMOVAL**

Defendants Maryland State Police, Colonel William Pallozzi, Captain Scott Keyser, Lieutenant Dan Fairburn, and First Sergeant Diane Hansen, by their attorneys, Brian E. Frosh, Attorney General of Maryland, and Phillip M. Pickus, Assistant Attorney General, hereby give notice of the removal of the case entitled *Ariana Esposito v. Maryland Department of State Police, et al.*, Case No. 03C16004328 in the Circuit Court for Baltimore County to the United States District Court for the District of Maryland, pursuant to 28 U.S.C. § 1441 and § 1446. In support of their Notice of Removal, Defendants state the following:

1. This civil action is brought by Ariana Esposito, who claims she was discriminated against as an employee/trooper-candidate with the Maryland State Police.

2. This action was commenced when it was filed in the Circuit Court for Baltimore County on April 21, 2016. *See* Exhibit 1, Docket entries. This action is currently pending in that court.

3. Defendants Maryland State Police, Colonel William Pallozzi, Captain Scott Keyser, Lieutenant Dan Fairburn, and First Sergeant Diane Hansen are represented by the Office of the Maryland Attorney General. The Defendant Maryland State Police was served on June 16, 2016. The four individual defendants have not yet been served. Undersigned counsel now waives service for Defendants Pallozzi, Keyser, Fairburn, and Hansen. All named defendants consent and join in this Removal.

4. Plaintiff alleges four causes of action pursuant to 42 U.S.C. § 1983, one common law wrongful discharge claim, and a claim brought pursuant to the Maryland Fair Employment Practices Act. *See* Exhibit 2, Complaint.


5. This Court has original jurisdiction over this action under 28 U.S.C. §1331 since this case arises under 42 U.S.C. § 1983 for alleged violations of federal civil rights. This action is therefore subject to removal to this Court pursuant to 28 U.S.C. § 1441(b) as a claim arising under the United States Constitution and 28 U.S.C. § 1441(c) as to the state law claims.

6. Pursuant to Local Rule 103.5, copies of all papers served on Defendants to date are attached hereto as Exhibit 2, Complaint.

7. This notice is being filed with this Court within 30 days after service of original papers on the removing parties in this action.

Respectfully submitted,

BRIAN E. FROSH  
Attorney General of Maryland

---

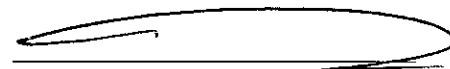
PHILLIP M. PICKUS  
General Bar No. 02551

Assistant Attorney General  
Office of the Attorney General  
Maryland State Police  
1201 Reisterstown Road  
Pikesville, Maryland 21202  
Telephone: (410) 653-4293  
Telefax: (410) 653-4270  
[Phillip.pickus@maryland.gov](mailto:Phillip.pickus@maryland.gov)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 15th day of July, 2016, a copy of the foregoing Notice of Removal, with attached exhibits, was mailed, first class postage prepaid, to:

Melanie L. Glickson  
Glickson Law Firm, LLC  
6 Reservoir Circle, Suite 201  
Pikesville, Maryland 21208

  
Phillip M. Pickus